Baseline Environmental Investigation

Final

Site-Specific Safety and Health Plan Attachment
For the Chemical Defense Training Facility
Parcel 126Q-CWM
Fort McClellan
Calhoun County, Alabama
EPA ID No. AL7 210 020 562

Prepared for:

U.S. Army Corps of Engineers, Mobile District 109 St. Joseph Street Mobile, Alabama 36602

Prepared by:

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Delivery Order CK07 Contract No. DACA21-96-D-0018 IT Project No. 780567

May 1999

Revision 1

Final

Site-Specific Safety and Health Plan Attachment Approval Fort McClellan, Calhoun County, Alabama

I have read and approve this site-specific safety and health plan attachment for the Chemical Defense Training Facility at Fort McClellan, Alabama, with respect to project hazards, regulatory requirements, and IT Corporation procedures.

Steh G. Man for	Doto
Jeanné Yacoub, PE	Date
Project Manager	
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Sak Son Mile Honococon	5/27/9

Michael Henderson, CIH
Health & Safety Manager

Leff Tary
Site Coordinator

5/27/9

Date

Acknowledgements.

The final approved version of this site-specific safety and health plan (SSHP) attachment for the Chemical Defense Training Facility at Fort McClellan, Alabama, has been provided to the site coordinator. I acknowledge my responsibility to provide the site coordinator with the equipment, materials, and qualified personnel to implement fully all safety requirements in this SSHP attachment. I will formally review this plan with the health and safety staff every 6 months until project completion.

Project Manager

D-44

I acknowledge receipt of this SSHP attachment from the project manager, and that it is my responsibility to explain its contents to all site personnel and cause these requirements to be fully implemented. Any change in conditions, scope of work, or other change that might affect worker safety requires me to notify the project manager and/or the health and safety manager.

Site Coordinator

Date

Site-Specific Safety and Health Plan Acknowledgement Form

I have been informed of, and will abide by the procedures set forth in, this site-specific safety and health plan attachment for the activities at the Chemical Defense Training Facility at Fort McClellan, Calhoun County, Alabama.

Printed Name	Signature	Representing	Date
-			

Fort McClellan Gate Hours

Baltzell Gate	Baltzell Road.
	Open 24 hours daily, 7 days a week.

Fort McClellan Project Emergency Contacts

Fire Department (on post)	Ext. 17
Fire Department (off post)	(256) 820-1117
Ambulance (on post)	Ext. 12
Ambulance (off post)	(256) 848-2315
Military Police (on post)	Ext. 5-3821
Military Police (off post)	(256) 848-5555
Regional Medical Center	(256) 235-5121
Chemical Agent Emergencies	Ext. 17
UXO Emergencies	Ext. 17
UXO Nonemergencies/Reporting Only (Ronald Levy)	
National Response Center	(800) 424-8802
Poison Control Center	(800) 462-0800
EPA Region IV	(404) 562-8725
Ronald Levy, Chief, FTMC Environmental Management	(256) 848-3758
Ellis Pope, U.S. Army Corps of Engineers	(334) 690-3077
Jeanne Yacoub, IT Project Manager	(423) 453-7665
Michael Henderson, IT H&S Manager	(423) 690-3211
Dr. Flaine Theriault, IT Occupational Physician	(800) 229-3674

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List of Acronyms

BZ breathing zone

CDTF Chemical Defense Training Facility

CWA chemical warfare agent

DS2 Decontamination Solution No. 2

ESE Environmental Science and Engineering, Inc.

FTMC Fort McClellan

GB sarin

HTH calcium hypochlorite

PPE personal protective equipment

SHP installation-wide safety and health plan

SSHO site safety and health officer

SSHP site-specific safety and health plan

VX nerve agent (O-ethyl-S-[diisoproplaminoethyl]-methylphosphonothiolate)

1.0 Site Work Plan Summary

2 3 4 5 6 7	Project Objective. The objective of this investigation at Fort McClellan (FTMC), Calhoun County, Alabama is to collect and analyze samples from the Chemical Defense Training Facility (CDTF), Parcel 126Q-CWM.
8	Project Tasks
9 10 11 12 13 14 15	 Collect 17 surface soil samples. Collect 13 subsurface soil samples. Collect 5 groundwater sample Collect 2 depositional soil samples Collect 1 surface water sample Collect 1 sediment sample.
17	Personnel Requirements. Up to ten employees.
18	
19	Note: All personnel on this site shall have received training, informational programs, and
20	medical surveillance as outlined in the installation-wide safety and health plan (SHP) for site
21	investigations at FTMC, and be familiar with the requirements of this site-specific SHP (SSHP).

This SSHP must be used in conjunction with the SHP for FTMC.

22

2.0 Site Characterization and Analysis

2 3	
3	2.1 Anticipated Hazards
5	The activity hazard analysis in Chapter 5.0 contains project-specific practices utilized to reduce
6	or eliminate anticipated site hazards. The activity hazard analysis indicates specific chemical and
7	physical hazards that may be present and encountered during each task from on-site operations.
8	Below each task is a list of hazards and specific actions that will be taken to control the respec-
9	tive hazards. These control measures may include work practice controls, engineering controls,
10	and/or use of appropriate personal protective equipment (PPE).
11	
12	The CDTF is currently an active, high-security facility. The facility has been used from 1987 to
13	the present. Types of training that occur at this site are chemical warfare agent (CWA) deconta-
14	mination procedures. Warfare agent chemicals used at this site include sarin (GB), nerve agent
15	(O-ethyl-S-[diisoproplaminoethyl]-methylphosphonothiolate) (VX), caustic, bleach,
16	Decontamination Solution No. 2 (DS2), calcium hypochlorite (HTH), silver fluoride, silver
17	nitrate, buffer solutions, and Army detection equipment that uses americium 241 and nickel 63
18	sources. GB and VX are the only chemical warfare agents ever used at this facility
19	(Environmental Science and Engineering, Inc. [ESE], 1998). Appendix A contains a material
20	safety data sheet for DS2.
21	
22	During the environmental baseline survey site visit, CDTF personnel indicated that the entire
23	interior of the Training Building where CWA is manufactured (from binary components), stored,
24	or used should be considered contaminated (ESE, 1998). However, this investigation will not
25	address the environmental condition of the interior of the Training Building. The current CDTF
26	operating contractor, EG&G, Inc., will conduct CWA sampling within the CDTF. The results of
27	the EG&G CWA sampling program will be combined with the hazardous toxic and radiologic
28	waste information collected by IT Corporation (IT) to establish a baseline of the environmental
29	condition at the CDTF.
30	
31	Table 2-1 contains the toxicological and physiological properties of chemicals anticipated or to

2

be used at the CDTF.

32 33

Table 2-1

Toxicological and Physical Properties of Chemicals Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

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Substance [CAS]	IPª (eV)	Odor Threshold (ppm)	Route⁵	Symptoms of Exposure	Treatment	TWA°	STEL⁴	Source*	IDLH (NIOSH)'
Acetone [67-64-1]	9.7	13-100	Inh Ing Con	Irritated eyes, nose, and throat; headache, dizziness; dermatitis.	Eye: irrigate immediately Skin: Soap wash immediately Breath: Respiratory support Swallow: immediate medical attention	750 ppm 750 ppm 250 ppm	1,000 ppm 1,000 ppm	PEL TLV REL	20,000 ppm
DS2	?	?	inh Ing Con	Direct contact will corrode skin, cause corneal opacification, severe burns, and esophageal stricture; inhalation may cause CNS depression, liver damage, nausea, vomiting, and respiratory irritation. Repeated skin and respiratory exposure can cause skin sensitization and asthma.	Eye: Irrigate immediately Skin: Water flush promptly Breath: Respiratory support Swallow: Immediate medical attention. Give milk/water if conscious.	1 ppm 1 ppm 5.2 mg/m³		TLV TLV TLV TLV	
Ethanol	9.51	NA	inh Ing Con	Irritated eyes, skin, nose; headache; cough, liver damage; anemia.	Eye: Irrigate Immediately Skin: Water flush promptly Breath: Fresh air Swallow: Immediate medical attention	1,000 ppm 1,000 ppm 1,000 ppm		PEL TLV REL	3,300 ppm (LEL)

Table 2-1

Toxicological and Physical Properties of Chemicals Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

(Page 2 of 4)

Substance [CAS]	IP⁴ (eV)	Odor Threshold (ppm)	Route⁵	Symptoms of Exposure	Treatmen	nt	TWA°	STEL ⁴	Source*	IDLH (NIOSH)'
Fuel oil (diesel oil, medium)	?	?	ing Inh Con	Ingestion causes nausea, vomiting, and cramps; depressed central nervous system, headache, coma, death; pulmonary irritation; kidney and liver damage; aspiration causes severe lung irritation, coughing, gagging, dyspnea, substernal stress, pulmonary edema; bronchopneumonia; excited, then depressed, central nervous system.	Eye: Irrigate pro Skin: Soap was Breath: Respirator Swallow: Immediate attention Aspiration: Immediate attention	h ry support e medical			PEL TLV REL	
Gasoline [8006-61-9]	?	0.3	Inh Ing Con	Intoxication, headaches, blurred vision, dizziness, nausea; eye, nose throat irritation; potential kidney and other cancers. Car- cinogenic.	Eye: Irrigate Imr min) Skin: Soap wash Breath: Respiratory Swallow: Immediate attention	y support	300 ppm 300 ppm Ca, lowest feasible conc. (LOQ 15 ppm)	500 ppm 500 ppm	PEL TLV REL	?
n-Hexane [110-54-3]	10.18	65-248	Inh Ing Con	Lightheadedness; nausea, headache; numbness of the extremities, muscular weakness; irritation of the eyes and nose; dermatitis; chemical pneumonia; giddiness.	Eye: Irrigate Imr Skin: Soap wash Breath: Respirator Swallow: Immediate attention	n immediately y support	50 ppm 50 ppm 50 ppm		PEL TLV REL	5,000 ppm
Hydrogen chloride (hydrochloric acid) [74-90-8]	12.74	0.255-10.6	Inh Ing Con	inflamed nose, throat, larynx; cough, burns throat, choking; burns eyes, skin; dermatitis; in animals; laryngeal spasm; pulmonary edema.	Eye: Irrigate Im Skin: Water flus Breath: Respirator Swallow: Immediate attention	h immediately y support		C5 ppm C5 ppm C5 ppm	PEL TLV REL	100 ppm

Table 2-1

Toxicological and Physical Properties of Chemicals Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

(Page 3 of 4)

Substance [CAS]	IPª (eV)	Odor Threshold (ppm)	Route⁵	Symptoms of Exposure	Treatment	TWA°	STEL⁴	Source*	IDLH (NIOSH)'
Isopropyl alcohol (Isopropanol) [67-63-0]	10.16	43-200	Inh Ing Con	Mild irritation of the eyes, nose, and throat; drowsi- ness, dizziness, headache; dry, cracked skin.	Eye: Irrigate immediately Skin: Water flush Breath: Respiratory support Swallow: Immediate medical attention	400 ppm 400 ppm 400 ppm	500 ppm 500 ppm 500 ppm	PEL TLV REL	12,000 ppm
Nitric acid [7697-37-2]	11.95	0.3-1	Inh Ing Con	Irritated eyes, mucous membranes, and skin; delayed pulmonary edema, pneumonitis, bronchitis; dental erosion.	Eye: Irrigate immediately Skin: Water flush promptly Breath: Respiratory support Swallow: Immediate medical attention	2 ppm 2 ppm 2 ppm	4 ppm 4 ppm 4 ppm	PEL TLV REL	100 ppm
Portland cement			Inh	Fine gray powder that can be irritating if inhaled or in eyes.	Eye: Irrigate immediately Skin: Soap wash immediately Breath: Respiratory support Swallow: Immediate medical attention		10 mg/m³ 10 mg/m³/ total dust 5 mg/m³ respirable fraction	TLV PEL/REL	
Sodium hydroxide [1310-73-2]	NA	NA	inh Ing Con	Irritated nose; pneumonitis; burns eyes, and skin; temporary loss of hair.	Eye: Irrigate immediately Skin: Water flush immediately Breath: Respiratory support Swallow: Immediate medical attention		C2 mg/m³ C2 mg/m³ C2 mg/m³	PEL TLV REL	250 mg/m³
Sulfuric acid [7664-93-9]	?	0.15	inh Ing Con	Irritated eyes, nose, and throat; pulmonary edema, bronchitis; emphysema; conjunctivitis; stomatitis; dental erosion; tracheobronchitis; skin and eye burns; dermatitis.	Eye: Irrigate immediately Skin: Water flush immediately Breath: Respiratory support Swallow: Immediate medical attention	1 mg/m³ 1 mg/m³ 1 mg/m³	3 mg/m³	PEL TLV REL	80 mg/m³

^{*}IP = Ionization potential (electron volts).

^{*}Route = Inh, Inhalation; Abs, Skin absorption; Ing, Ingestion; Con, Skin and/or eye contact.

^{*}TWA = Time-weighted average. The TWA concentration for a normal work day (usually 8 or 10 hours) and a 40-hour work week, to which nearly all workers may be repeatedly exposed, day after day without adverse effect.

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Table 2-1

Toxicological and Physical Properties of Chemicals Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

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⁴STEL = Short-term exposure limit. A 15-minute TWA exposure that should not be exceeded at any time during a workday, even if the TWA is not exceeded.

*PEL = Occupational Safety and Health Administration (OSHA) permissible exposure limit (29 CFR 1910.1000, Table Z).

AEL = Airborne Exposure Limit.

TLV = American Conference of Governmental Industrial Hygiene (ACGIH) threshold limit value—TWA.

REL = National Institute for Occupational Safety and Health (NIOSH) recommended exposure limit.

'IDLH (NIOSH)-Immediately dangerous to life or health (NIOSH). Represents the maximum concentration from which, in the event of respirator failure, one could escape within 30 minutes without a respirator and without experiencing any escape-impairing or irreversible health effects.

NE = No evidence could be found for the existence of an IDLH (NIOSH Pocket Guide to Chemical Hazards, Pub. No. 97-140, 1997).

C = Ceiling limit value which should not be exceeded at any time.

Ca = Carcinogen.

NA = Not applicable.

? = Unknown.

LEL = Lower explosive limits.

LC_{so} = Lethal concentration for 50 percent of population tested.

 $LD_{so} = Lethal$ dose for 50 percent of population tested.

NIC = Notice of intended change (ACGIH).

References:

American Conference of Governmental Industrial Hygienists Guide to Occupational Exposure Values, 1998, compiled by the American Conference of Governmental Industrial Hygienists.

Amoore, J. E. Hautula, "Odor as an Aid to Chemical Safety," Journal of Applied Toxicology, 1983.

Clayton, George D., Clayton, F. E., Patty's Industrial Hygiene and Toxicology, 3rd ed., John Wiley & Sons, New York.

Documentation of TLVs and BEIs, American Conference of Governmental Industrial Hygienists, 6th ed., 1998.

Fazzuluri, F. A., Compilation of Odor and Taste Threshold Values Data, American Society for Testing and Materials, 1978.

Gemet, L. J. Van. Compilation of Odor Threshold Values in Air and Water, CIVO, Netherlands, 1977.

Gemet, L. J. Van, Compilation of Odor Threshold Values in Air and Water, Supplement IV, CIVO, Netherlands, 1977.

Lewis, Richard J., Sr., 1992, Sax's Dangerous Properties of Industrial Materials, 8th ed., Van Nostrand Reinhold, New York.

Micromedex Tomes Plus (R) System, 1992, Micromedex, Inc.

National Institute for Occupational Safety and Health Pocket Guide to Chemicals, Pub. No. 97-140, 1997, National Institute for Occupational Safety and Health.

Odor Threshold for Chemicals with Established Occupational Health Standards, American Industrial Hygiene Association, 1989.

Respirator Selection Guide, 3M Occupational Health and Safety Division, 1993.

Verschuseren, K., Handbook of Environmental Data on Organic Chemicals, Van Nostrand and Reinhold, 1977.

Warning Properties of Industrial Chemicals—Occupational Health Resource Center, Oregon Lung Association.

Workplace Environmental Exposure Levels, American Industrial Hygiene Association, 1992.

22	General	Site	Inform	ation
Z.Z	aciiciai	O_{I}	*******	

1	
2	

- 3 Location of Site. The CDTF is located on the western portion of the Main Post. The site
- 4 covers an area of approximately 8 acres.
- 5 Duration of Planned Employee Activity. Employee activity duration is 1 month.

6

7 **Site Topography.** The site elevation is approximately 915 feet.

8

- 9 Pathways for Hazardous Substance Dispersion. Possible pathways for hazardous
- substances in the area are groundwater and soils.

The work activities will begin in the following levels of protection. Also, a completed descrip-tion of Level D, Modified Level D, and Level C PPE is provided.

Task	Initial Level of PPE
Staging equipment	Level D
Collecting samples	Modified Level D*

*Initial level will be raised to Level C or higher if air monitoring results in the worker's breathing

Level D. The minimal level of protection that will be required of IT personnel at the site will be Level D. The following equipment will be used for Level D protection:

Hard hat

Hearing protection (when working near/adjacent to operating equipment).

Modified Level D. The following equipment will be used for Level D-Modified protection:

- Permeable Tyvek, Kleenguard, or its equivalent (Saran-coated tyvek where chemical agents are anticipated)
- Latex boot covers

zone (BZ) are greater than action levels.

Coveralls or work clothing

Steel-toed safety boots

Safety glasses

• Leather work gloves (when necessary)

- Nitrile, heavy work, or latex gloves
- Steel-toed safety boots
- Safety glasses
- Hard hat
- Hearing protection (when working near/adjacent to operating equipment).

1	Note: In addition to modifying Level D PPE, the operator of high-pressure water jetting			
2	equipment shall wear metatarsal guards for the legs and feet.			
3				
4	Level C. Level C protection will not be used unless air-monitoring data indicate the need for			
5	upgrade; however, the equipment shall be readily available on site. The following equipment			
6	will be used for Level C protection:			
7				
8	 National Institute of Occupational Safety and Health/Mine Safety and Health 			
9	Administration-approved full-face, air-purifying respirators equipped with organic			
10	vapor/acid gas cartridge in combination with high-efficiency particulate air filter			
11				
12	 Hooded, Saran-coated Tyvek, taped at gloves, boots, and respirator 			
13	NTA The allower Constants			
14	Nitrile gloves (outer)			
15 16	Latex or lightweight nitrile gloves (inner)			
10 17	Latex of right weight intine gloves (mile)			
18	• Neoprene steel-toed boots or polyvinyl chloride overbooties/steel-toed safety boots			
19				
20	Hard hat			
21				
22	 Hearing protection (when working near/adjacent to operating equipment). 			
23				
24	Note: In addition to Level C PPE, the operator of high-pressure water jetting equipment shall			
25	wear metatarsal guards for the legs and feet.			

4.0 Site Monitoring

1	
2	
3	

The environmental contaminants of concern resulting from CDTF operations are unknown at this time. Since all CWA usage is limited to inside the buildings, exposure to CWA outside of the building is not expected. Table 4-1 contains action levels for site monitoring at the CDTF.

Monitoring will be performed by the site safety and health officer (SSHO) during the performance of ground-intrusive operations. A calibrated flame ionization detector (i.e., organic vapor analysis 128 or equivalent) organic vapor analyzer will be utilized to monitor the sampling locations and BZs to determine if any organic material may be present that would necessitate upgrading of protection level. A calibrated combustible gas/oxygen indicator will be utilized to monitor the sampling locations and BZ to determine if any combustible/flammable gases or oxygen levels are present that would necessitate evacuation of the work area. Table 4-2 contains the air monitoring frequency and location for site monitoring at the CDTF.

Table 4-1

Action Levels Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

When in Level C PPE

Analyte	Action Level	Required Action ^a
Volatile organic hydrocarbons (VOH)	≥ 10 ppm above background in breathing zone (BZ)	Stop work, evacuate work area, upgrade to Level B.
Oxygen	≥ 20%, <23% < 20%, >23%	Normal operations. Stop work, evacuate work area.
Flammable vapors ≥ 10% LEL < 10% LEL		Stop work, evacuate work area. Continue operations, monitor for VOCs.

When in Level D Modified/D PPE

Analyte	Action Level	Required Action⁵
VOHs	≥ 5 ppm above background in BZ	Stop activities, suspend work activities for 15 to 30 minutes, if readings are sustained then upgrade to Level C PPE.
Oxygen	≥ 20%, <23% < 20%, >23%	Normal operations. Stop work, evacuate work area.
Flammable vapors ≥ 10% LEL < 10% LEL.		Stop work, evacuate work area. Continue operations, monitor for VOCs.

When in Support Zone

Analyte	Action Level	Required Action
VOHs	≥ 1 ppm above background in BZ	Evacuate support zone and re- establish perimeter of exclusion zone.

^a Four instantaneous peaks in any 15-minute period or a sustained reading for 5 minutes in excess of the action level will trigger a response.

No one is permitted to downgrade levels of PPE without authorization from the H&S manager.

^b Contact with the H&S manager must be made prior to continuance of work. The H&S manager may then initiate perimeter/integrated air sampling along with additional engineering controls.

Table 4-2

Air Monitoring Frequency and Location Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

Work Activity	Instrument	Frequency	Location
Staging equipment	OV Monitor	Initially for area	Breathing zone (BZ) of employees
Sampling (groundwater and soil)	OV Monitor LEL/O ₂ Monitor	Continuously Continuously	BZ of employees Support zone

OV = Organic vapor.

LEL/O₂ = Lower explosive level/oxygen.

5.0 Activity Hazard Analysis The attached activity hazard analysis (Table 5-1) is provided for the following activities: Setup of equipment and general field activities Soil, groundwater, surface water, and sediment sampling. All injuries and illnesses must be immediately reported to the site manager or the SSHO, who will then notify off-site personnel and organizations as necessary.

If hospital care must be provided, the victim shall be treated at Northeast Regional Medical

Center. Directions to the hospital are provided in Figure 1-1.

Activity Hazard Analysis Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

(Page 1 of 12)

Activity	Potential Hazards	Recommended Controls
Staging Equipment	Slip, trip, and fall hazards	 Determine best access route before transporting equipment. Practice good housekeeping; keep work area picked up and clean as feasible. Continually inspect the work area for slip, trip, and fall hazards. Look before you step; ensure safe and secure footing.
	Heavy lifting	Use proper lifting techniques. Lifts greater than 60 pounds require assistance or mechanical equipment.
	Falling objects	Stay alert and clear of materials suspended overhead; wear hard hat and steel-toed boots.
	Flying debris, dirt, dust, etc.	Wear safety glasses/goggles; ensure that eye wash is in proper working condition.
	Pinch points	 Keep hands, fingers, and feet clear of moving/suspended materials and equipment. Beware of contact points. Stay alert at all times!
	Cuts/bruises	Use cotton or leather work gloves for material handling.
	Bees, spiders, and snakes	Inspect work area carefully and avoid placing hands and feet into concealed areas.
	Ticks	 Wear light colored clothing (can see ticks better). Mow vegetated and small brush areas. Wear insect repellant. Wear long sleeves and long pants. Visually check oneself promptly and frequently after exiting the work area.
	Fire	Fire extinguishers shall be suitably placed, distinctly marked, readily accessible, and maintained in a fully charged and operable condition.
	Hazard communication	 Label all containers as to contents and dispose of properly. Ensure Material Safety Data Sheets (MSDS) are available for hazardous chemicals used on site.

Activity Hazard Analysis Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

(Page 2 of 12)

Activity	Potential Hazards	Recommended Controls
Staging Equipment (continued)	Noise	Sound levels above 85 decibels (dBA) mandates hearing protection.
	Lighting	Adequate lighting will be provided to ensure a safe working environment.
	Cold stress	 Workers should wear insulated clothing when temperatures drop below 40 degrees Fahrenheit (°F). Drink warm beverages on breaks. Refrain from drinking caffeinated beverages. Remove wet clothing promptly. Take breaks in warm areas. Reduce work periods as necessary. Layer work clothing.
	Poison ivy/oak/sumac	 Avoid plant areas if possible. Wear long sleeves and long pants. Promptly wash clothing that has contacted poisonous plants. Wash affected areas immediately with soap and water.
	Heat rash	 Keep the skin clean and dry. Change perspiration-soaked clothing, as necessary. Bathe at end of work shift or day. Apply powder to affected area.
	Heat cramps	 Drink plenty of cool fluids even when not thirsty. Provide cool fluid for work crews. Move victim to shaded, cool area.
	Heat exhaustion	 Conduct physiological worker monitoring as needed (i.e., heart rate, oral temperature). Set up work/rest periods. Use the "buddy system." Allow workers time to acclimate. Have ice packs available for use. Take frequent breaks.

Activity Hazard Analysis Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

(Page 3 of 12)

Activity	Potential Hazards	Recommended Controls
Staging Equipment (continued)	Heat stroke	Evaluate possibility of night work. Perform physiological monitoring on workers during breaks. Wear body cooling devices.
	Contact with moving equipment/vehicles	 Work area will be barricaded/demarcated. Equipment will be laid out in an area free of traffic flow. Barricades shall be used on or around work areas when it is necessary to prevent the inadvertent intrusion of pedestrian traffic. Barriers shall be used to protect workers from vehicular traffic. Barriers shall be used to guard excavations adjacent to streets or roadways. Flagging shall be used for the short term (less than 24 hours) to identify hazards until proper barricades or barriers are provided. Heavy equipment shall have backup alarms.
·	Forklift operations	 Use qualified and trained forklift operators. The operator shall not exceed the load capacity rating for the forklift. The load capacity shall be clearly visible on the forklift. Forklift operators shall inform their supervisor of any prescribed medication that they are taking that would impair their judgement.
	Portable electric tools	 Portable electric tools that are unsafe due to faulty plugs, damaged cords, or other reasons, shall be tagged (do not use) and removed from service. Portable electric tools and all cord and plug connected equipment shall be protected by a ground-fault circuit interrupter (GFCI) device. Electrical tools shall be inspected dally prior to use.

Activity Hazard Analysis Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

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Activity	Potential Hazards	Recommended Controls
Staging Equipment (continued)	Extension cords	 Extension cords that have faulty plugs, damaged insulation, or are unsafe in any way shall be removed from service. Cords shall be protected from damage from sharp edges, projections, pinch points (doorways), and vehicular traffic. Cords shall be suspended with a nonconductive support (rope, plastic ties, etc.). Cords shall be designed for hard duty. Cords shall be inspected daily.
	Lightning strikes	 Whenever possible, halt activities and take cover. If outdoors, stay low to the ground. Limit the body surface area that is in contact with the ground (i.e., kneeling on one knee is better than laying on the ground). Seek shelter in a building if possible. Stay away from windows. If available, crouch under a group of trees instead of one. Keep all body parts in contact with the ground as close as possible. Remain 6 feet away from tree trunk if seeking shelter beneath tree(s). If in a group, keep 6 feet of distance between people.
	Thunderstorms, tornados	 Listen to radio or TV announcements for pending weather information. Cease field activities during thunderstorm or tornado warnings. Seek shelter. Do not try to outrun a tornado.
Surveying	Slip, trip, and fall hazards	 Site workers will be required to wear hard hat, safety glasses with side shields, work gloves, and steel-toe boots when working in the field. Provide adequate lighting in all work areas. Whenever possible, avoid routing cords and hoses across walking pathways. Flag or cover inconspicuous holes to protect against falls. Work areas will be kept clean and orderly. Garbage and trash will be disposed of dally in approved refuse containers. Tools and accessories will be properly maintained and stored. Work areas and floors will be kept free of dirt, grease, and slippery materials.

Activity Hazard Analysis Chemical Defense Training Facility, Parcel 126Q-CWM Fort McClellan, Calhoun County, Alabama

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Activity	Potential Hazards	Recommended Controls
Surveying (continued)	Traffic accidents	 Place physical barrier (i.e., barricades, fencing) around work areas regularly occupied by pedestrians. If working adjacent to roadways, have workers wear fluorescent orange vests. Use warning signs or lights to alert oncoming traffic. Assign flag person(s) if necessary to direct local traffic. Set up temporary parking locations outside the immediate work area. Motor vehicle operators shall obey all posted traffic signs, signals, and speed limits. Pedestrians have the right-of-way. Wear seat belts when vehicles are in motion.
	Wildlife hazards	Workers should be cautious when driving through the site in order to avoid encounters with passing animals.
	Biological hazards Ticks	 Walking through overgrown grass areas, watch for snakes (rattlesnakes, moccasins, copperheads). Wear light colored clothing (can see ticks better). Mow vegetated and small brush areas. Wear insect repellant. Wear long sleeves and long pants. Visually check oneself promptly and frequently after exiting the work area.
	Polson ivy/oak/sumac	 Avoid plant areas if possible. Wear long sleeves and long pants. Promptly wash clothing that has contacted poisonous plants. Wash affected areas immediately with soap and water.

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Activity	· Potential Hazards	Recommended Controls
Groundwater Sampling	Cross-contamination and contact with potentially contaminated materials	 Sampling technicians will wear proper protective clothing and equipment to safeguard against potential contamination. Avoid skin contact with water. Handle samples with care. Only essential personnel will be in the work area. Real-time air monitoring will take place before and during sampling activities. All personnel will follow good hygiene practices. Proper decontamination procedures will be followed. All liquids and materials used for decontamination will be contained and disposed of in accordance with federal, state, and local regulations.
	Cut hazards	Use care when handling glassware. Wear adequate hand protection.
	Hazard communication	MSDSs shall be obtained for chemicals brought on site. Label all containers as to contents.
	Strains/sprains	 Use the proper tool for the job being performed. Get assistance if needed. Avoid twisting/turning while pulling on tools, moving equipment, etc.
	Spills/residual materials	Absorbent material and containers will be kept available where leaks or spills may occur.
	Lighting	Adequate lighting will be provided to ensure a safe working environment.
	Unattended worker `	Use "buddy system" - visual contact will be maintained with the sampling technician during sampling activities.

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Activity	Potential Hazards	Recommended Controls
Soil Boring and Surface/Subsurface Sampling	Cross-contamination and contact with potentially contaminated materials	 Stop immediately at any sign of obstruction. Sampling technicians will wear proper protective clothing and equipment to safeguard against potential contamination. Only essential personnel will be in the work area. Real-time air monitoring will take place before and during sampling activities. All personnel will follow good hygiene practices. Proper decontamination procedures will be followed. All liquids and materials used for decontamination will be contained and disposed of in accordance with federal, state, and local regulations.
	Cut hazards	Use care when handling glassware. Wear adequate hand protection.
	Slip, trip, and fall hazards	 Site workers will be required to wear hard hat, safety glasses with side shields, work gloves, and steel-toe/shank boots when working in the field. Whenever possible, avoid routing cords and hoses across walking pathways. Flag or cover inconspicuous holes to protect against falls.
	Bees, spiders, and snakes	 Workers shall inspect the work area carefully and avoid placing hands and feet into concealed areas. Evaluate need for sensitive workers to have prescribed antibiotic or medicine to combat onset of symptoms.
	Polson lvy/oak/sumac	 Avoid plant areas if possible. Wear long sleeves and long pants. Promptly wash clothing that has contacted poisonous plants. Wash affected areas immediately with soap and water.
	Cold stress	 Workers should wear insulated clothing when temperatures drop below 40°F. Drink warm beverages on breaks. Refrain from drinking caffeinated beverages. Remove wet clothing promptly. Take breaks in warm areas. Reduce work periods as necessary. Layer work clothing.

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Activity	Potential Hazards	Recommended Controls
Soil Boring and Surface/Subsurface Sampling (continued)	Access/egress hazards	 Use qualified and trained bushhog operator. Keep employees out of the bushhog work area. Utilize good housekeeping practices. Keep alsleways, pathways, and work areas free of obstruction. Clean ice or snow off of walkways or work stations. Use appropriate footwear for the task assigned.
	Heat rash	 Keep the skin clean and dry. Change perspiration-soaked clothing, as necessary. Bathe at end of work shift or day. Apply powder to affected area.
	Heat cramps	 Drink plenty of cool fluids even when not thirsty. Provide cool fluid for work crews. Move victim to shaded, cool area.
	Heat exhaustion	 Conduct physiological worker monitoring as needed (i.e., heart rate, oral temperature). Set up work/rest periods. Use the buddy system. Allow workers time to acclimate. Have ice packs available for use. Take frequent breaks.
	Heat stroke	 Evaluate possibility of night work. Perform physiological monitoring on workers during breaks. Wear body cooling devices.

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Activity	Potential Hazards	Recommended Controls
Soil Boring and Surface/Subsurface Sampling (continued)	Lightning strikes	 Whenever possible, halt activities and take cover. If outdoors, stay low to the ground. Limit the body surface area that is in contact with the ground (i.e., kneeling on one knee is better than laying on the ground). Seek shelter in a building if possible. Stay away from windows. If available, crouch under a group of trees instead of one single tree. Keep all body parts in contact with the ground as close as possible. If in a group, keep 6 feet of distance between people.
Moving and Shipping Collected Samples	Heavy lifting	Use proper lifting techniques. Lifts greater than 60 pounds require assistance or mechanical equipment; size up the lift.
Campico	Pinch points	 Keep hands, fingers, and feet clear of moving/suspended materials and equipment. Beware of contact points. Stay alert at all times!
	Cut hazards	Wear adequate hand protection. Use care when handling glassware.
	Hazard communication	Label all containers as to contents and associated hazards.
	Heavy lifting	Use proper lifting techniques. Lifts greater than 60 pounds require assistance or mechanical equipment; size up the lift.
Material Storage	Flammable and combustible liquids	 Store in NO SMOKING AREA. Fire extinguisher readily available. Transfer only when properly grounded and bonded.
Disposal of Investigation-Derived Waste (IDW) (Forklift Operation)	Personnel injury, property damage, and/or equipment damage	 Use qualified and trained forklift operators. The operator shall not exceed the load capacity rating for the forklift. The load capacity shall be clearly visible on the forklift. Forklift operators shall inform their supervisor of any prescribed medication that they are taking that would impair their judgement.

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Activity	Potential Hazards	Recommended Controls
Disposal of Investigation-Derived Waste (IDW) (Forklift Operation) (continued)	Cross-contamination and contact with potentially contaminated materials	 Stop immediately at any sign of obstruction. Sampling technicians will wear proper protective clothing and equipment to safeguard against potential contamination. Only essential personnel will be in the work area. Real-time air monitoring will take place before and during sampling activities. All personnel will follow good hygiene practices. Proper decontamination procedures will be followed. All liquids and materials used for decontamination will be contained and disposed of in accordance with federal, state, and local regulations.
	Cut hazards	Use care when handling glassware. Wear adequate hand protection.
High-Pressure Water Jetting Operations	Heavy lifting	Use proper lifting techniques. Lifts greater than 60 pounds require assistance or mechanical equipment; size up the lift.
	Slip, trip, and fall hazards	 Good housekeeping shall be implemented. The work area shall be kept clean as feasible. Inspect the work area for slip, trip, and fall hazards.
	Fueling	 Only approved safety cans shall be used to store fuel. Do not refuel equipment while it is operating. Fire extinguishers shall be suitably placed, distinctly marked, readily accessible, and maintained in a fully charged and operable condition.
	Faulty or damaged equipment	 Equipment shall be inspected before being placed into service and at the beginning of each shift. Preventive maintenance procedures recommended by the manufacturer shall be followed. A lockout/tagout procedure shall be used for equipment found to be faulty or undergoing maintenance.
	High-pressure water	 Jetting gun operator must wear appropriate PPE including hard hat, impact-resistant safety glasses with side shields, water-resistant clothing, metatarsal guards for feet and legs, and hearing protection (if appropriate). One standby person shall be available within the vicinity of the pump during jetting operation. The work area shall be isolated and adequate barriers will be used to warn other site personnel.
	Unqualified operators	Only qualified and trained personnel are permitted to operate machinery and mechanized equipment associated with water jet cutting and cleaning.

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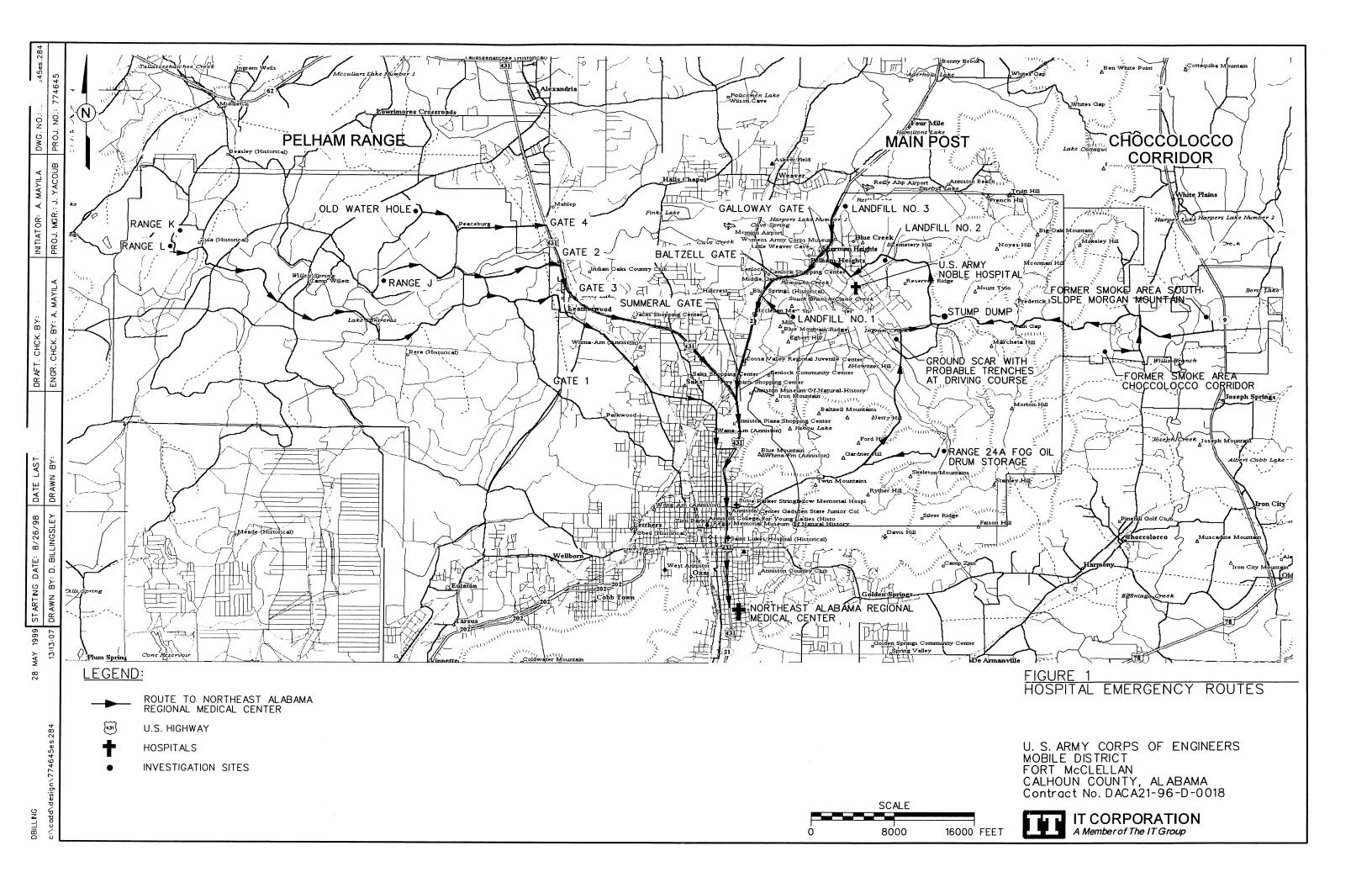
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Activity	Potential Hazards	Recommended Controls
High-Pressure Water Jetting Operations (continued)	Out of control equipment	 No machinery or equipment is permitted to run unattended. Machinery or equipment will not be operated in a manner that will endanger persons or property nor will the safe operating speeds or loads be exceeded.
	Noise	Sound levels above 85 dBA mandates hearing protection by nearby site personnel.
	Activation during repairs	 All machinery or equipment will be shut down and positive means taken to prevent its operation while repairs or manual lubrications are being done.
	Pinch points	Keep feet and hands clear of moving/suspended materials and equipment. Stay alert and clear of materials suspended.
	Falling objects	Hard hats are required by site personnel. Stay alert and clear of material suspended overhead.
	Flying debris	Impact-resistant safety glasses with side shields are required.
	Contact with potentially contaminated materials	All site personnel will wear the appropriate PPE.
Hydropunch Sampling	Faulty or damaged equipment being utilized to perform work	 All machinery or mechanized equipment will be inspected by a competent mechanic and certified to be in safe operating condition. Equipment will be inspected before use and at the beginning of each shift. Faulty/unsafe equipment will be tagged and if possible locked out. Drill rigs shall be equipped with reverse signal alarm, backup warning lights, or the vehicle is backed up only when an observer signals it is safe to do so.

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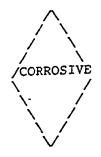
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Activity	Potential Hazards	Recommended Controls
Hydropunch Sampling (continued)	Uneven terrain, poor ground support, inadequate clearances, contact with utilities	 Inspections or determinations of road conditions and structures shall be made in advance to ensure that clearances and load capacities are safe for the passage or placing of any machinery or equipment. All mobile equipment and areas in which they are operated shall be adequately illuminated. Whenever the equipment is parked, the parking brake shall be set. Equipment parked on inclines will have the wheels chocked. Inspect brakes and tire pressure on drill rig before staging for work. Obtain trenching/drilling permit prior to operation.
	Inexperienced operator	 Machinery and mechanized equipment shall be operated only by designated personnel. Heavy equipment operators shall inform their supervisor(s) of any prescribed medication that they are taking that would impair their judgement.
	Jacks/outriggers	Ensure proper footing and cribbing.
	Falling objects	 Remove unsecured tools and materials before raising or lowering the derrick. Stay alert and clear of materials suspended overhead.
	Pinch points	 Keep feet and hands clear of moving/suspended materials and equipment. Stay alert at all times!
	Fire	 Mechanized equipment shall be shut down prior to and during fueling operations. Have fire extinguishers inspected and readily available.
	Fall hazards	 Personnel are not allowed to work off of machinery or use them as ladders. Use fall protection when working above 6 feet.
	Noise	Hearing protection is mandatory above 85 dBA.
	Contact with rotating or reciprocating machine part	 Use machine guards; use long-handled shovels to remove auger cuttings. Safe lockout procedures for maintenance work.
	Heavy lifting	Use proper lifting techniques. Lifts greater than 60 pounds require assistance or mechanical equipment; size up the lift.
	Slip, trlp, and fall hazards	 Practice good housekeeping; keep work area picked up and clean as feasible. Continually inspect the work area for slip, trip, and fall hazards.
	Contact with potentially contaminated materials	Real-time air monitoring will take place. If necessary, proper personal protective clothing and equipment will be utilized.



APPENDIX A

DS2 - MATERIAL SAFETY DATA SHEET



U.S. ARMY EGDEWOOD RESEARCH, DEVELOPMENT AND ENGINEERING CENTER

HCSDS NO: 20059A Emergency Telephone #s: ERDEC Safety Office 301-671-4411 0800-1630 EST After normal duty hours: 301-278-5201 Ask for ERDEC Staff Duty Officer

DATE: 31 July 1981 REVISED: 15 Sept 1994

DS2

MATERIAL SAFETY DATA SHEET

SECTION I - GENERAL INFORMATION

MANUFACTURER'S ADDRESS: U.S. ARMY CHEMICAL BIOLOGICAL DEFENSE COMMAND

EDGEWOOD RESEARCH DEVELOPMENT AND ENGINEERING CENTER

ATTN: SCBRD-ODR-S

ABERDEEN PROVING GROUND, MD 21010-5423

111-40-0 (Diethylenetriamine) CAS Registry No:

1310-73-2 (Sodium Hydroxide)

109-86-4 (Ethylene Glycol Monomethyl Ether)

CHEMICAL NAME AND SYNONYMS:

MIXTURE OF: '

SYNONYMS:

Diethylenetriamine (70%)

Bis (2-Aminoethyl) amine

DETA

Sodium Hydroxide (2%)

Caustic soda

Ethylene Glycol

Monomethyl Ether (28%)

Methyl Cellosolve 2-Methoxyethanol

EGME

TRADE NAME AND SYNONYMS:

Decontaminating Agent, DS2

DS2

Decon Agent DS2

CHEMICAL FAMILY: Mixture

FORMULA/CHEMICAL STRUCTURE:

Diethylenetriamine - NH2 (CH2)2 NH (CH2)2 NH2

Sodium Hydroxide - NaOH

Ethylene Glycol Monomethyl Ether - CH3 OCH2 CH2 OH

NATIONAL STOCK NUMBER (NSN):

Decontaminating Agent DS2, 1-1/3 quart can, NSN: 6850-00-753-4827 Decontaminating Agent DS2, 5 gallon pail, NSN: 6850-00-753-4870
Decontaminating Apparatus, Portable, 14 liter, M13, NSN: 4230-01-133-4124

14 Liter Container, Fluid Filled, NSN: 6850-01-136-8888

NFPA 704 SIGNAL: Health -

Flammability-2

Reactivity-



SECTION II - HAZARDOUS INGREDIENTS

Diethylenetriamine - 69-71%

TLV: 4.2 mg/m3 (1 ppm) (skin)
TLV: 2 mg/m3 (ceiling)

Sodium Hydroxide - 1.9-2.1%

Ethylene Glycol

Monomethyl Ether - 26.9-29.1%

TLV: 16 mg/m3 (5 ppm) (skin)

SECTION III - PHYSICAL DATA

BOILING POINT DEG F (DEG C): 380 (193.3)

SPECIFIC GRAVITY (H20 = 1): 0.97 - 0.98

APPEARANCE AND ODOR: Clear amber solution with ammonia-like odor.

VISCOSITY (centistokes): 9.9 @ 20 DEG C

SECTION IV - FIRE AND EXPLOSION DATA

FLASHPOINT: (Method Used): The flashpoint of the mixture has been determined to be 168 DEG F (75.5 DEG C) by the closed cup method. The lowest flashing component of the mixture (ethylene glycol monomethyl ether) has a flashpoint

EXTINGUISHING MEDIA: Carbon dioxide, alcohol foam, water

of 115 DEG F (46 DEG C) by the closed cup method.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Never mix or store acids, oxidizing agents, STB (Supertropical Bleach) or HTH (High Test Hypochlorite) together with DS2; fire or explosion may result.

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: DS2 is made of two major components (EGME & DETA) with different toxicities and physical properties. The TLV of the mixture (calculated) is 5.2 mg/m3 as an 8 hour time weighted average (TWA). To date the Occupational Safety and Health Administration (OSHA) has not promulgated a permissible exposure limit for DS2 per se nor has the value proposed been officially adopted as a part of a special occupational safety and health standard for DS2 in accordance with DOD 6055.1.

EFFECTS OF OVEREXPOSURE: No toxicity data are available on DS2 per se; however, the toxicity of each of the components has been partially determined.

- (1) DS2 is an alkali and with direct contact will corrode tissue, e.g., skin, eye, respiratory mucosa or gastric mucosa. The effects exhibited depend on route of exposure, amount of substance present, and duration of exposure. Health effects can range from mild burns and primary irritation to corneal opacification, severe burns and esophageal stricture.
- (2) Sufficient exposure to EGME, a major component of DS2, may cause central nervous system depression and liver damage. Although not definitely established in humans, reproductive effects (including teratogenisis) are also a major concern with this substance. The National Institute for Occupational Safety and Health (NIOSH) recommends that EGME be regarded in the workplace as having the potential to cause adverse reproductive effects in male and female workers. Appropriate controls must be instituted to minimize worker exposure to EGME.
- (3) Exposure to high vapor concentrations of DS2 can cause nausea, vomiting, and respiratory irritation as acute effects.
 - (4) Repeated skin and respiratory exposures to DETA can cause skin

sensitization and asthma.

EMERGENCY AND FIRST AID PROCEDURES:

INHALATION: Remove to fresh air. If breathing has stopped, give artifical respiration. If breathing is difficult, give oxygen. Seek medical attention immediately. Additional supportive measures may be required.

EYE CONTACT: Immediately flush the eyes with copious amounts of water for at least 15 minutes. Seek medical attention immediately.

SKIN CONTACT: Flush away the DS2 from the skin with water until "soapiness" is no longer present. Seek medical attention immediately.

INGESTION: If the patient is conscious, give as much milk or water as possible. Do not induce vomiting. Seek medical attention immediately. Supportive measures may be required.

SECTION VI - REACTIVITY DATA

INCOMPATIBILITY: DS2 is a corrosive material and because of its content, it is incompatible with some metals (e.g., cadmium, tin and zinc); some plastics (e.g., Lexan, cellulose acetate, polyvinyl chloride, Mylar, and acrylic); some paints; wool; leather; oxidizing materials (e.g., Supertropical Bleach or High Test Hypochlorite); and acids.

REACTIVITY: DS2 will deteriorate in air. Exposure of 48 hours or more to open air will result in the formation of gelatin-like bodies on the surface of DS2.

SECTION VII- SPILL, LEAK AND DISPOSAL PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Spills on porous surfaces (concrete, wood, etc.) should be cleaned and neutralized immediately. Otherwise, they will be absorbed and become an indefinite hazard. All spills must be contained, e.g., by covering with dry sodium bisulfate to neutralize and then absorbing them on vermiculite (NSN 5640-01-324-2664), clay or diatomaceous earth. Scoop up all this material and any contaminated soil or substrate and place in an epoxycoated drum with a fully removable head, and label as corrosive IAW EPA and DOT requirements. During spills provide adequate ventilation and remove any ignition source. During clean up, personnel should wear a full face respirator with an organic vapor cartridge effective against Diethylenetriamine and Methyl Cellosolve, rubber gloves long enough to protect hands and arms, and a full length rubber apron. Contaminated clothing and shoes should be removed immediately and washed thoroughly with water before reuse. Avoid contact with leaking liquid or vapor. All wash water should have pH measured. All material with a pH less than 2.0 or greater than 12.5 is hazardous waste with an EPA number of D002.

WASTE DISPOSAL METHOD: Waste DS2 has been tested and is a hazardous waste with an EPA waste number of D002. Disposal methods for waste DS2 and accumulated spill cleanup residues must comply with RCRA, state, and local hazardous waste regulations and procedures. If the wastes are corrosive they have the EPA Hazardous Waste Number of D002. This number should be used when the waste is manifested, to permit the use of off-site hazardous waste disposal facilities. For disposal of excess stocks of pure DS2, coordinate with the Defense Reutilization and Marketing Office (DRMO). Disposal methods at overseas military installations must be in accordance with the laws of the host country.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION:

Concentration (mg/m3) 8 hour TWA Respiratory Protection

Less then 5.2 (as mixture i.e., 3.7 mg/m3 DETA and 1.5 mg/m3 EGME)

Escape type respirators shall be available when necessary.

o any NIOSH approved full facepiece respirator
with an organic vapor canister. (i.e. gas mask)

o any NIOSH approved escape type SCBA

Greater then 5.2 or unknown concentrations

o any NIOSH approved full facepiece pressure demand SCBA

o any NIOSH approved full-face piece positive pressure, supplied-air respirator with auxiliary SCBA

NOTE: For military personnel engaged in training scenarios the M9, M17 or M40 series mask is acceptable. Filter elements and canisters should be changed after each use with DS2.

VENTILATION: Local exhaust - Necessary if TLV (TWA) exceeded.

PROTECTIVE GLOVES: Butyl Rubber

EYE PROTECTION: Splashproof chemical goggles. When there is potential for severe exposure, chemical goggles and face shield are recommended.

OTHER PROTECTIVE EQUIPMENT: Hooded chemical-resistant clothing (i.e., overalls & long sleeve jacket, or one- or two-piece chemical splash suit) and chemical resistant boots. Military personnel will use standard issue equipment during training operations.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Avoid extreme temperatures (e.g. 160 Deg F or higher) during storage.

SECTION X - TRANSPORTATION DATA

PROPER SHIPPING NAME: Caustic Alkali Liquids, n.o.s. UN 1719

DOT HAZARD CLASSIFICATION: Corrosive Material, Class 8, Packing Group II

DOT LABEL: Corrosive with an "8"

DOT MARKING: Caustic Alkali Liquids, n.o.s. (Diethylenetriamine,

Ethylene Glycol Monomethyl Ether, Sodium Hydroxide)

UN 1719

DOT PLACARD: Corrosive

EMERGENCY ACCIDENT PRECAUTIONS & PROCEDURES: See Sections IV, VII, and VIII.

PRECAUTIONS TO BE TAKEN IN TRANSPORTATION: Shipping "on-deck" or "underdeck" is permitted in cargo and passenger vessels subject to the requirements of 49 CFR 176.63 (b) and (c). MSDS for DS2 will be placed with all shipments. DS2 is limited to 5 gallons per package when shipped by cargo aircraft. Bulk packaging of DS2 (1 1/3 quart, 5 gallons, and M13 Portable Deontaminating Apparatus) are not authorized for shipment on passenger carrying aircraft or rail cars. Shipment on passenger carrying aircraft or railcar is permitted in 1 quart packages. DS2 will be packed and shipped in accordance with 49 CFR 173.202. Packaging exceptions can be found in 49 CFR 173.154.